

1448-398

04/21/2011

1/8



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

APR 21 2011

Crystal W. Brown
Buckman Laboratories, Inc.
1256 North McLean Blvd.
Memphis, TN 38108

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Subject: WSKT 10
EPA Registration No.: 1448-398
Application Date: 03/29/2011
Receipt Date: 04/01/2011

Dear Ms. Crystal Brown:

The following amendment submitted in connection with registration under FIFRA, as amended, is acceptable with conditions.

Proposed Amendment

- Removal of fungi from Directions for Use

Conditions

Revise the label as follows:

- 1) Revise the 7th statement of the Precautionary Statements to read:

"Wash thoroughly with soap and water after handling and before eating, drinking, using tobacco, or using the toilet."
- 2) Revise the last statement under 5 gallons or less container handling section to read:

"Then offer for recycling if available or reconditioning, if appropriate, or puncture and dispose of in a sanitary landfill, or by other procedures if approved by state and local authorities."
- 3) As per PR Notice 2000-5, Mandatory Labeling, revise the following terms:
 - a. Revise "Recommendations" to "Requirements" in User Safety section of Precautionary Statements.
 - b. Revise "should" to "must" in the User Safety section of Precautionary Statements in the 1st, 2nd, and 4th sentences.
 - c. Revise "should" in the Directions for Use by:
 - i. In the cooling water systems
 1. Revise the 2nd sentence to read "In noticeably fouled systems, add WST10 at a dosage..."
 2. Revise the 3rd sentence to read: "Clean extremely fouled systems to remove..."

- 3. Revise the last sentence to read: "To maintain control, add subsequent additions of 1.16 to 34.8 fluid ounces of WSKT 10 per 1000 gallons of system water."
- ii. In the air washer systems
 - 1. Revise the 2nd sentence to read like 2)c.i.2 above.
 - 2. Revise the 3rd sentence to read: "When systems are noticeably fouled, add WSKT 10 at an application rate..."
 - 3. Revise the 2nd to last sentence to read like 2)c.i.3 above.
- iii. In the metalworking fluid systems
 - 1. Revise the 2nd sentence to read: Add WSKT 10 tank-side to the system..."
 - 2. Revise the 3rd sentence to read like 2)c.i.2 above.
- iv. In fire water protection systems
 - 1. Revise the 2nd sentence to read: "Add WSKT 10 to the system at a point where it will be adequately distributed throughout the system."
 - 2. Revise the 3rd sentence to read: "Feed WSKT 10 to the system to maintain 200 to 800 ppm of product in the system."
 - 3. Revise the 5th sentence to read: "Evaluate subsequent doses based..."
- v. In petroleum secondary recovery
 - 1. Revise the 3rd sentence to read: "Make additions continuously or intermittently..."

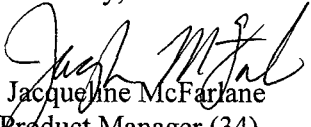
General Comments

A stamped label with conditions is enclosed for your records. Submit three (3) copies of your final printed label before distributing or selling the product bearing the revised labeling.

Should you have any questions or comments concerning this letter, you may contact me by telephone at (703) 308-6416 or by e-mail at campbell-mcfarlane.jacqueline@epa.gov or Jaclyn Carl by telephone at (703) 347-0213 or by e-mail at carl.jaclyn@epa.gov.

When submitting information or data in response to this letter, a copy of this letter should accompany the submission to facilitate processing.

Sincerely,



Jacqueline McFarlane
 Product Manager (34)
 Regulatory Management Branch II
 Antimicrobials Division (7510P)

WSKT 10

ACCEPTED
with COMMENTS
EPA Letter Dated:

3/8

Buckman

APR 21 2011

ACTIVE INGREDIENT(S)

Poly[oxyethylene(dimethyliminio)ethylene(dimethyliminio)ethylene dichloride].....

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No.

6.00%

0.52%

0.19%

93.29%

5-Chloro-2-methyl-4-isothiazolin-3-one.....

2-Methyl-4-isothiazolin-3-one.....

INERT INGREDIENTS.....

TOTAL.....

1448-398

100.00%

KEEP OUT OF REACH OF CHILDREN DANGER

FIRST AID

If in Eyes	- Hold eye open and rinse slowly and gently with water for 15-20 minutes. - Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. - Call a poison control center or doctor for further treatment advice.	cccc cccc cccc
If on Skin, Clothes	- Take off contaminated clothing. - Rinse skin immediately with plenty of water for 15-20 minutes. - Call a poison control center or doctor for treatment advice.	cccccc cccccc cccccc
If Swallowed	- Call poison control center or doctor immediately for treatment advice. - Have person sip a glass of water, if able to swallow. - Do not induce vomiting unless told to do so by the poison control center or doctor. - Do not give anything by mouth to an unconscious person.	cccccc cccccc cccccc
If Inhaled	- Move person to fresh air. - If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth if possible. - Call a poison control center or doctor for further treatment advice.	cccccc cccccc cccccc

HOT LINE NUMBER

Have the product container or label with you when calling a Poison Control Center or doctor or going for treatment. You may also contact 901-767-2722 for emergency medical treatment information.

NOTE TO PHYSICIAN

Probable mucosal damage may contraindicate the use of gastric lavage.

Precautionary Statements

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER: Corrosive. Causes irreversible eye damage. Do not get in eyes or on clothing. Wear goggles, face shield, or safety glasses. Harmful if swallowed or absorbed through skin. Avoid contact with skin. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse. Prolonged or frequently repeated skin contact may cause allergic reaction in some individuals.

Personal Protective Equipment: Applicators and other handlers must wear: coveralls over long-sleeved shirt and long pants, socks and chemical resistant footwear, goggles or face shield, chemical-resistant gloves (such as waterproof or rubber gloves). Respirator with an organic vapor removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C), or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G), or NIOSH approval number prefix organic vapor (OV) cartridge or canister with any N,R,P, or HE prefilter. For Cleaning Equipment: chemical-resistant apron. Remove contaminated clothing and wash clothing before reuse.

User Safety Recommendations: User should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet. User should remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. User should remove Personal Protective Equipment immediately after handling this product. Wash the outside of gloves before removing. As soon as possible wash thoroughly.

ENVIRONMENTAL HAZARDS: This pesticide is toxic to fish and wildlife. Do not discharge effluent containing this product into lakes streams, ponds, estuaries, oceans, or public waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA. Do not contaminate water by cleaning of equipment or disposal of waste. Apply this pesticide only as specified on the label.

Directions for Use

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

~~Do not apply this product in a way that will contact workers or other persons.~~

COOLING WATER SYSTEMS: WSKT 10 may be used to control the growth of microorganisms including bacteria and algae in recirculating cooling water systems. In noticeably fouled systems, WSKT 10 should be added at a dosage rate of 11.6 to 69.6 fluid ounces per 1000 gallons of system water (100 to 600 ppm WSKT 10). Extremely fouled systems should be cleaned to remove excess algal growth, excessive biofilm, and other deposits prior to program initiation. Subsequent additions of 1.16 to 34.8 fluid ounces of WSKT 10 per 1000 gallons of system water (10 to 300 ppm WSKT 10) should be made to maintain control.

AIR WASHER SYSTEMS: WSKT 10 may be used to control microbiological fouling in industrial airwash systems. Extremely fouled systems should be cleaned prior to addition of WSKT 10. When systems are noticeably fouled, WSKT 10 should be added at an application rate of 11.6 to 92.8 fluid ounces per 1000 gallons of system water (100 to 800 ppm WSKT 10) daily until control is evident. Subsequent additions of 11.6 to 58.0 fluid ounces per 1000 gallons of system water (100 to 500 ppm WSKT 10) should be added as needed to maintain control. **Not registered for this use in California.**

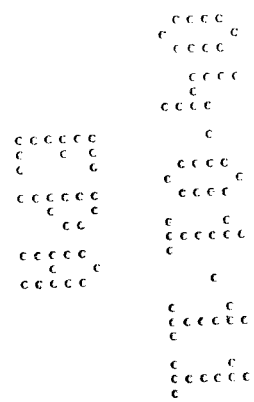
METALWORKING FLUID SYSTEMS: WSKT 10 may be used to prevent microbial degradation and fouling in metalworking fluid systems. WSKT 10 should be added tank-side to the system at 23.2 to 232 fluid ounces per 1000 gallons of dilute fluid (200 to 2000 ppm product) as needed to maintain control. Systems with excessive fouling should be cleaned prior to initiating the program. **Not registered for this use in California.**

FIRE WATER PROTECTION SYSTEMS: WSKT 10 can be added to help control microorganisms which may foul or cause corrosion in fire water protection systems. WSKT 10 should be added to the system at a point where it will be adequately distributed throughout the system. WSKT 10 should be fed to maintain 200 to 800 ppm of product in the system. This will require an initial dose of 23.2 to 92.8 fluid ounces per 1000 gallons of water. Subsequent doses should be evaluated based on microbiological activity and product level testing. **Not registered for this use in California.**

PETROLEUM SECONDARY RECOVERY: WSKT 10 is used to control sulfate reducing bacteria and slime forming bacteria in oil field water, polymer or micellar floods, water disposal systems, and other oil field water systems. WSKT 10 is used at concentrations of 100 to 800 ppm (weight/weight) or 11.6 to 92.8 fluid ounces per 1000 gallons of treated water. Additions should be made continuously or intermittently by means of a chemical-metering pump at the free water knockouts, before or after injection pumps and injection well headers. Continuous Feed Method: When system is noticeably fouled, add WSKT 10 at a rate of 100 to 800 ppm (weight/weight) or 11.6 to 92.8 fluid ounces per 1000 gallons of treated water until desired degree of control is achieved. Then treat with 100 to 800 ppm (weight/weight) or 11.6 to 92.8 fluid ounces per 1000 gallons of treated water continuously, or as needed to maintain control. Intermittent Feed Method: When desired, WSKT 10 can be fed directly by a timed chemical-metering pump. The dosage rate and feed time vary according to the degree of fouling, but typically 200 to 800 ppm (weight/weight) or 23.2 to 92.8 fluid ounces per 1000 gallons of water is added to the treated system for 4-8 hours per day, 1-4 times per week, or as needed to maintain control. **Not registered for this use in California.**

Storage and Disposal

See attached document for Storage and Disposal.



Manufactured by Buckman Laboratories, Inc.
1256 North McLean Blvd., Memphis, Tennessee 38108, USA
(901) 278-0330 or 1-800-282-5626

EPA Est. No. 1448-TN-1

EPA Reg. No. 1448-398

Product Weight 8.7 lbs/gal 1.04 kg/l

Net contents are marked on the container.

HMIS / NPCA Ratings

Health 3 Flammability 1 Reactivity 1

**Last
Revision
3/29/2011**

(Nonrefillable Containers, capacity of 5 gallons or less)
Do not contaminate water, food or feed by storage or disposal.

PESTICIDE STORAGE: Do not contaminate food or feed by storage, disposal or cleaning of equipment. This product is corrosive to mild steel. Do not store or transport in unlined metal containers.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative of the nearest EPA Regional Office for guidance.

CONTAINER HANDLING: Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container 1/4 full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for the later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times.

Then offer for recycling if available or reconditioning, if appropriate, or by other procedures if approved by state and local authorities.

GENERAL: CONSULT FEDERAL, STATE, OR LOCAL DISPOSAL AUTHORITIES FOR APPROVED ALTERNATIVE PROCEDURES.

(Nonrefillable Containers, capacity of greater than 5 gallons)
Do not contaminate water, food or feed by storage or disposal.

PESTICIDE STORAGE: Do not contaminate food or feed by storage, disposal or cleaning of equipment. This product is corrosive to mild steel. Do not store or transport in unlined metal containers.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative of the nearest EPA Regional Office for guidance.

CONTAINER HANDLING: Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the

container ¼ full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times.

Then offer for recycling if available or reconditioning, if appropriate, or puncture and dispose of in a sanitary landfill, or, by other procedures if approved by state and local authorities.

GENERAL: CONSULT FEDERAL, STATE, OR LOCAL DISPOSAL AUTHORITIES FOR APPROVED ALTERNATIVE PROCEDURES.

(Refillable Plastic Containers, capacity of greater than 55 gallons)

Do not contaminate water, food or feed by storage or disposal.

PESTICIDE STORAGE: Do not contaminate food or feed by storage, disposal or cleaning of equipment. This product is corrosive to mild steel. Do not store or transport in unlined metal containers.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative of the nearest EPA Regional Office for guidance.

CONTAINER HANDLING: Refillable container. Refill this container with pesticide only. Do not reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller.

To clean the container prior to refilling or disposal, use a pressure wash as follows: Empty the remaining contents into application equipment or a mix tank. Use a pressure wash system that rinses all interior sides with water and that is rated at >40 psi and >120F. Pressure wash the container for a length of time that ensures that a minimum 25% of the container volume of water is used. During the pressure wash, ensure that the container valve is left open for continuous draining. Collect the rinsate and empty into application equipment or a mix tank or store rinsate for later use or disposal. Allow container to drain for 10 minutes after pressure wash is completed.

GENERAL: CONSULT FEDERAL, STATE, OR LOCAL DISPOSAL AUTHORITIES FOR APPROVED ALTERNATIVE PROCEDURES.

(Refillable Plastic Containers, capacity of 55 gallons or less)

Do not contaminate water, food or feed by storage or disposal.

PESTICIDE STORAGE: Do not contaminate food or feed by storage, disposal or cleaning of equipment. This product is corrosive to mild steel. Do not store or transport in unlined metal containers.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative of the nearest EPA Regional Office for guidance.

CONTAINER HANDLING: Refillable container. Refill this container with pesticide only. Do not reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller.

To clean the container prior to refilling or disposal, use a triple rinse wash as follows: Empty the remaining contents from this container into application equipment or a mix tank. Fill the container about 10 percent full with water. Agitate vigorously. Pour or pump rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this rinsing procedure two more times.

GENERAL: CONSULT FEDERAL, STATE, OR LOCAL DISPOSAL AUTHORITIES FOR APPROVED ALTERNATIVE PROCEDURES.